

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

Case No. 24 Misc. \_\_\_\_\_

APPLICATION OF LOUDMILA  
BOURLAKOVA AND VERONICA  
BOURLAKOVA TO TAKE DISCOVERY FOR  
USE IN A FOREIGN PROCEEDING  
PURSUANT TO 28 U.S.C. § 1782

**APPLICATION AND PETITION OF LOUDMILA BOURLAKOV  
AND VERONICA BOURLAKOV FOR AN ORDER TO TAKE DISCOVERY FOR USE  
IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

Petitioners Loudmila Bourlakova and Veronica Bourlakova (“Petitioners”), pursuant to 28 U.S.C. § 1782 respectfully apply to this Court for an Order authorizing Petitioners to obtain certain limited discovery from Clearing House Payments Company L.L.C. (“CHIPS”) for use in a civil proceeding pending before the High Court of Justice, Business and Property Courts of England. In support of this Application, Petitioners submit a Memorandum of Law and attach the Declarations of Naomi Simpson (the “Simpson Declaration”), and the Declaration of Daniel J. Pohlman (the “Pohlman Declaration”) each with accompanying exhibits. The proposed subpoena *duces tecum* to be served on CHIPS is attached as Exhibit 1 to the Pohlman Declaration, and a proposed Order is attached as Exhibit 2 to the Pohlman Declaration.

Dated: New York, New York  
February 20, 2024

PRYOR CASHMAN LLP

By: /s/ E. Scott Schirick  
E. Scott Schirick  
Sidhardha Kamaraju  
Daniel J. Pohlman

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